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Attorneys for Defendant,

NISSAN NORTH AMERICA, INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

VICTORIA VALENZUELA, an
individual, and DANIEL ALVAREZ, an
individual,

Plaintiffs,

vs.

NISSAN NORTH AMERICA, INC., a
Delaware Corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No: [5:23-cv-02271-JGB-DTB](#)

Judge: Hon. Jesus G. Bernal

Magistrate Judge: Hon. David T. Bristow

JOINT NOTICE OF SETTLEMENT

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiffs, VICTORIA VALENZUELA and
3 DANIEL ALVAREZ, and Defendant, NISSAN NORTH AMERICA, INC., (the
4 “Parties”), jointly, write to advise this Court that they have settled this matter; however,
5 the attorneys’ fees, costs, and expenses remain outstanding. Nissan has agreed to pay all
6 reasonably incurred fees subject only to supporting billing records being provided.
7 Plaintiffs intend to file a noticed motion. The Parties request that the Court vacate any
8 upcoming hearings and deadlines while the performance of the settlement terms is
9 pending.

10 Once all terms of the settlement are completed and payment is received by
11 Plaintiffs and after payment of Plaintiffs’ attorneys’ fees, costs, and expenses, to be
12 determined by agreement of the Parties or by noticed motion, the Parties shall file an
13 executed Stipulation of Dismissal of the entire action with prejudice. The Parties expect
14 to file the dismissal papers within 90 days.

15 Based on the foregoing, the Parties respectfully request that the Court Order that
16 this action be dismissed without prejudice and the Court continue to retain jurisdiction
17 over this action to enforce the terms of the settlement agreement.

18
19 Dated: March 18, 2025,

QUILL & ARROW LLP

20 By Kevin Y. Jacobson
21 Kevin Y. Jacobson, Esq.
22 Andrew C. Jung, Esq.
23 Attorneys for Plaintiffs,
24 VICTORIA VALENZUELA
25 DANIEL ALVAREZ

26
27 Dated: March 18, 2025,

SHOOK, HARDY & BACON L.L.P.

28 By: /s/ Amir Nassihi
Amir Nassihi, Esq.
David Polyakov, Esq.
Attorneys for Defendant,
NISSAN NORTH AMERICA, INC.